

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

COMPUTE NORTH HOLDINGS, INC., *et al.*,¹

Debtors.

)
) **Chapter 11**
)
) **Case No. 22-90273 (MI)**
)
) **(Jointly Administered)**
) **Re: Docket Nos. 256, 767**

**CERTIFICATE OF NO
OBJECTION REGARDING DEBTORS' THIRD
NOTICE OF REJECTION OF CERTAIN EXECUTORY
CONTRACTS OR UNEXPIRED LEASES AND ABANDONMENT
OF PROPERTY IN CONNECTION THEREWITH (FOUNDRY CONTRACTS)**

Pursuant to the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned representatives of Compute North Holdings, Inc. and its affiliates (collectively, the "Debtors") certify as follows:

1. On October 24, 2022, the Bankruptcy Court entered an order approving, among other relief, certain procedures for the rejection of the Debtors' executory contracts and unexpired leases [Docket No. 256] (the "Rejection Procedures Order").
2. On January 2, 2023, pursuant to the terms of the Rejection Procedures Order, the Debtors filed their *Third Notice of Rejection of Certain Executory Contracts or Unexpired Leases*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors' service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

and Abandonment of Property in Connection Therewith (Foundry Contracts) (the “Notice”)² [Docket No. 767].

3. The Notice was served on all parties receiving electronic notice in this case via ECF and on the parties set forth on the Certificate of Service of the Notice.

4. The deadline for parties to file a response to the Notice was January 12, 2023 (the “Objection Deadline”). More than 24 hours have passed since the Objection Deadline. The Debtors have removed that certain Master Sale, Rental and Service Agreement, dated as of December 20, 2021, and the Associated Purchase Orders between Compute North LLC and Solomon Corporation (the “Parties”) from the schedule of Rejected Contracts in the Proposed Order, as the Parties work toward a global resolution with respect to all claims thereunder. Counsel for the Debtors has reviewed the Court’s docket and no objection/response to the Notice appears thereon. Counsel for the Debtors has not received any objection or response to the Notice, and is not aware of any such objection or response.

5. Attached hereto as **Exhibit A** is the proposed form of order granting the requested relief in the Notice (the “Proposed Order”). Attached hereto as **Exhibit B** is a redline of the Proposed Order reflecting changes between the Proposed Order and the proposed order attached to the Notice.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, granting the relief requested in the Notice, and granting such other and further relief as the Court may deem proper.

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Notice.

Respectfully submitted,

Dated: January 13, 2023
Houston, Texas

/s/ James T. Grogan III

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